

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JAL EXPORTS,

Civil Case No.: 1:24-cv-01059-PAE

Plaintiff,

-against-

NOTICE OF MOTION

RJ Vintage LLC and Charles Azrack,

Defendants.
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PLEASE TAKE NOTICE, that upon the annexed Memorandum of Law dated April 17, 2024, the Declaration of Chirag Prakash Thakkar executed on April 16, 2024, the Declaration of Eleni Melekou, Esq. executed sworn into on April 17, 2024, and all the pleadings filed in this action, Plaintiff JAL EXPORTS will move this Court, pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure and Rule 55.2 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an order: (1) entering a default judgment against Defendant RJ Vintage LLC, (2) awarding Plaintiff damages at least in the amount of \$114,879.40 together with post- and pre-judgment interest and costs, and (3) for such other and further relief that this Honorable Court may deem just and proper.

Dated: New York, New York
April 17, 2024

Respectfully submitted,

PARDALIS & NOHAVICKA, LLP

/s/ Eleni Melekou

By: Eleni Melekou, Esq.

Attorneys for Plaintiff

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